

Michael Foley

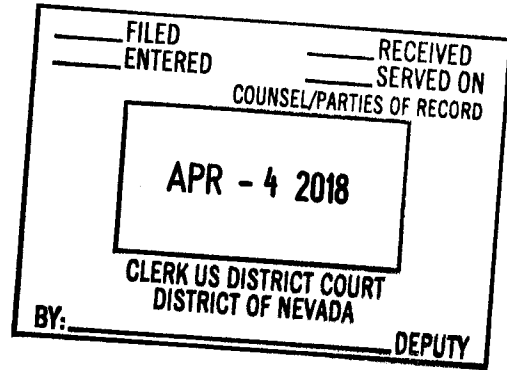
Name

209 S. Stephanie St. Ste. B-191

Henderson, Nevada 89012

702-771-9725

Phone Number



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Michael Foley

Plaintiff,

vs.

Christopher Hermes, an individual,

Paul Carapucci, Jr., an individual,

Monica Lang, an individual; Carol J Erbach,

an individual; Pamela Norton-Lindemuth,

an individual; Clark County School District

Defendant(s).

**CASE NO. 2-16-cv-02369-APG-PAL**  
(To be supplied by the Clerk)

**SECOND AMENDED  
CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983  
JURY TRIAL DEMANDED**

**A. JURISDICTION**

1) This complaint alleges that the civil rights of Plaintiff, Michael Foley,  
(Print Plaintiff's name)

who presently resides at Clark County, Nevada, were

violated by the actions of the below named individuals which were directed against

Plaintiff at Clark County, Nevada on the following dates  
(institution/city where violation occurred)

October 9, 2014, November 12, 2015, and October 4, 2016.  
(Count I) (Count II) (Count III)

Michael Foley

Name  
209 S. Stephanie St. Ste. B-191

Henderson, Nevada 89012

702-771-9725

Phone Number

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

(Continued)

Michael Foley  
Plaintiff,

vs.

Christopher Hosein, an individual;

Doreen Kwiecien, an individual;

Debbie Hancock, an individual;

Clark County, Patricia Foley, an

individual, DOES 1-20, ROES 1-20

Defendant(s).

CASE NO. 2:16-cv-02369-APG-PAL  
(To be supplied by the Clerk)

**SECOND AMENDED  
CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983**

**JURY TRIAL DEMANDED**

**A. JURISDICTION**

- 1) This complaint alleges that the civil rights of Plaintiff, Michael Foley,  
(Print Plaintiff's name)

who presently resides at Clark County, Nevada, were

violated by the actions of the below named individuals which were directed against

Plaintiff at Las Vegas, Nevada on the following dates  
(institution/city where violation occurred)

October 9, 2014, November 12, 2015, and October 4, 2016.  
(Count I) (Count II) (Count III)

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant Christopher Hermes resides at 1310 Watermill Ct Henderson, Nevada  
(full name of first defendant) (address if first defendant)  
and is employed as a Clark County school official. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Hermes acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and violate his freedom of  
association with them.

3) Defendant Paul Carapucci, Jr. resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school police officer. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Carapucci acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and violate his freedom of  
association with them.

4) Defendant Monica Lang resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school principal. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Lang acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and violate his freedom of association  
with them.

5) Defendant Carol J Erbach resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school principal. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Erbach acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and violate his freedom of  
association with them.

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant Clark County School District resides at Clark County, Nevada,  
(full name of first defendant) (address if first defendant)  
and is employed as a public education institution. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant CCSD acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and violate his freedom of  
association with them.

3) Defendant Christopher Hosein resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school police officer. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Hosein acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and to violate his right to freedom  
of association with them.

4) Defendant Doreen Kwiecien resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school clerk. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Kwiecien acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and to violate his freedom of  
association with them.

5) Defendant Debbie Hancock resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a school registrar. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Hancock acted and conspired with the other defendants to deny  
and chill the plaintiff's right to manage his children's education and to violate his freedom of  
association with them.

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant Clark County resides at State of Nevada,  
(full name of first defendant) (address if first defendant)  
and is employed as political subdivision. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant  
was acting

under color of law: Defendant Clark County has failed to train the above defendants, and has  
created a hostile and oppressive education system that discriminates against parents based  
on gender and marital status.

3) Defendant Patricia Foley resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as a casino dealer. This defendant is sued in his/her  
(defendant's position and title, if any)  
X individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Defendant Patricia Foley directed, enabled, acted and conspired with the  
other defendants to deny and chill the plaintiff's right to manage his children's education, and  
violate his freedom of association with them using the power of the co-defendants.

4) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_

5) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_

6) Defendant Pamela Norton-Lindemuth resides at \_\_\_\_\_,  
 (full name of first defendant) (address if first defendant)  
 and is employed as an assistant principal. This defendant is sued in his/her  
 (defendant's position and title, if any)  
X individual X official capacity. (Check one or both). Explain how this defendant was  
 acting

under color of law: Defendant Norton acted and conspired with the other defendants to deny and chill the plaintiff's right to manage his children's education and violate his freedom of association with them.

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

\_\_\_\_\_  
 \_\_\_\_\_

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#### B. NATURE OF THE CASE

1) Briefly state the background of your case.

This is an action for damages and injunctive relief, petitioned by the plaintiff because the above-named defendants are opposed to him having any meaningful part in his children's education. The defendants have acted in a malicious, indifferent, deliberate, arbitrary and capricious fashion to systematically prevent the Plaintiff from having normal access to his children's educational records, and have deliberately frustrated and interfered with his efforts to protect his children from bullying and sexual harassment. Furthermore, since the Plaintiff has informed the defendants that he would seek redress in this Court, some of them have intensified their efforts to deny the Plaintiff normal access to the respective campuses of the schools that his children attend for their public education, despite the fact that the Plaintiff poses no threat, nor has he done anything to anyone that would justify the denial of him associating with and attending to his children at their schools, and their educational curriculum. The individual defendants named herein, at various times in the past several years have literally threatened the defendant with arrest and confinement for no lawful or justifiable reason, but for returning to the school after having normal interactions, and for trying to address matters as any concerned parent would. These defendants are aided and abetted by unknown accomplices herein identified as defendants ROES 1-20 and DOES 1-20.

#### C. CAUSE OF ACTION

## COUNT I

The following civil rights has been violated: \_\_\_\_\_

The fundamental constitutional right to the companionship, care, custody and management of one's children, and their education.

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

On or about October 9, 2014, the Plaintiff visited the campus of Desert Oasis High School to deliver a copy of a dissolution of a protection order that Defendant Patricia Foley had obtained to harass and chill the plaintiff's exercise of his parental rights. For nearly ten years, said defendant has been using deception and fraud to frustrate and deny the plaintiff's parental rights. Said defendant has also enlisted many individuals to carry out her years long campaign to deprive the plaintiff of his rights to have a meaningful, significant and integral part in his children's lives. As part of this effort, defendant Patricia enlisted various officials at said high school (herein, "D.O.") and motivated them to completely deny the Plaintiff access to his daughter's (herein "T")'s academic records. The Plaintiff's parental rights to his children have never been lawfully terminated or otherwise foreclosed from having access to and a meaningful part in his children's educational programming. The Plaintiff's parental rights to ALL of his children are supported by several court orders issued since Patricia was obligated to divorce the Plaintiff by her gambling addiction enabler, the Plaintiff's evil sister Michelle Pont. The Plaintiff has never done anything to warrant or justify being barred from having normal access to his children's educational records, and having a part in the planning of their curriculum. Likewise, the Plaintiff has always acted reasonably with the named defendants, but notwithstanding his normal and justifiable interest in his children's education, the defendants Hermes and Carapucci, Jr. opposed the defendant's efforts to address and deal with sexual predators who were bullying and harassing his daughter T who attended DO during the years 2013-2015, and who was effectively forced to drop out of the school because DO and the defendants

**COUNT I (continued)**

The following civil rights has been violated: \_\_\_\_\_

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

deliberately and indifferently failed to address the problems identified by this father, the plaintiff.  
The defendants Hermes and Carapucci's failure to address the cyber-bullying and sexual  
harassment of T with the Plaintiff resulted in a downward spiraling of T's performance in school  
and was the cause of her dropping out, and the plaintiff's exclusion from his child's academic  
life, to which he has a right to attend, plan and control as granted by God Almighty and guaranteed  
by the U.S. Constitution. Said defendants, by their deliberate indifference, created a hostile  
educational environment for both the Plaintiff and his daughter T. The Plaintiff's relationship with  
his daughter is damaged because the defendants opposed his preventative efforts rather than  
allow him to meet and confer with his daughter at the DO campus to work out a solution to the  
threats against her, a right guaranteed the Constitution and supported by a domestic court order.  
On or about October 9, 2014, at the direction of defendant Hermes, Defendant Carapucci ejected  
the plaintiff from DO and threatened to arrest him if he returned to the campus for any reason.  
Said action was also in retaliation for obtaining a dissolution of the protection order that the  
defendants wanted to enforce against the plaintiff, as it was also the wish of defendant  
Patricia Foley to deny the plaintiff of his parental rights. Rather than respect the court order  
reversing the previous order that prevented the plaintiff from having normal custody and  
interaction with his daughter T, and his other children at their schools, the aforementioned defendants  
retaliated against him and the domestic court for undoing the unjust order that unjustly prevented the  
plaintiff from attending to his children at their schools, and IMMEDIATELY upon the plaintiff  
noticing them that the unjust order was dissolved. This instant action in contravention to the  
defendants wish that the Plaintiff be denied access to his children at their schools was retaliatory in  
nature because the plaintiff did nothing other than notice them of a court order that they disliked and  
opposed him having.



## COUNT II

The following civil rights has been violated: \_\_\_\_\_

The fundamental constitutional right to the companionship, care, custody and management of one's children and their education.

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

On or about May 7, 2015, the Plaintiff went to Canarelli middle school to pick up his son, herein referenced as "M," and asked the person handling the early check out of students to summon M. The plaintiff was asked to sign a log to record the event. Because the plaintiff wanted to avoid any dispute that he withdrew his son according to proper procedure, he memorialized the signing of the log with his mobile phone's camera. The plaintiff then left the campus without incident. Sometime thereafter, he received a voicemail message from someone at the school telling him that she did not approve of him memorializing his signature. The plaintiff ignored the message and forgot about it since it was close to the end of the school year. However, because the message was recorded in a hostile tone, the plaintiff opted to not return to the office to withdraw his son for the remainder of the school year. On or about October 4, 2016, the plaintiff went to the same school, Canarelli, to pick up his youngest child (herein, "E"), who began attending the school in August of 2016. After several uneventful pickups using the normal checkout protocol, on said date, the plaintiff was prevented from having his daughter summoned to begin his court-supported custody time. One of the staffers, defendant Doreen Kwiecien, said that the "computer is slow" in response to the plaintiff's question as to why there was a delay in bringing his child. Another school worker, defendant D. Hancock went to retrieve "E"'s academic file in a back office. These defendants were formerly identified as ROEs 1 and 2. After several minutes of waiting in the office for his child to be summoned, the plaintiff was asked by Hancock to go with her to a place outside the earshot of M who was also waiting for his sister with the plaintiff. The plaintiff respectfully declined to go with Hancock who then informed the plaintiff, in front of his son M,

**COUNT II (continued)**

The following civil rights has been violated: \_\_\_\_\_

The fundamental constitutional right to the companionship, care, custody, an management of one's children, and their education.

\_\_\_\_\_

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

that he was no longer disallowed from coming to the campus, but that Hancock would not allow him to take custody of his daughter because she supposedly had a court order saying that he could not have custody on that day. This false information was fed to the defendants by defendant Patricia Foley in order to dissuade the plaintiff from taking lawful custody of his child. The defendants did not bother to verify the false report and lied that they had a court order (when in fact there was no such order) preventing the plaintiff from taking custody of his children at the school. Hancock asked the plaintiff to wait for the arrival of defendant Monica Lang, who authorized the school defendants to prevent the Plaintiff from taking custody of his daughter. The plaintiff left the office because it was apparent that the defendants were going to cause him grief. Since this incident, the plaintiff has been chilled from having normal interaction with the school, and from doing normal things with his daughter at the school, like taking her to lunch, and asking about her academic progress, which is the design of all of the defendants.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### COUNT III

The following civil rights has been violated: \_\_\_\_\_

The fundamental constitutional right to the companionship, care, custody and management of one's children and their education.

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

In or about October 2015, the Plaintiff was experiencing difficulties inquiring about his daughter "E"'s academic progress. The plaintiff also was frustrated by office support personnel at William Wright Elementary School where his daughter was enrolled in 5th grade. The plaintiff asked to be named as the emergency contact for his daughter, rather than an illegal alien named by defendant Patricia Foley. After 2 or more attempts to have the issue addressed, the principal defendant principal Caro J Erbach and Vice Principal Pamela Norton-Lindemuth brought the Plaintiff into a conference room and attempted to dissuade him from exercising his parental and custodial rights by falsely claiming that he did not have the right to have custody of his daughter E and that they would NOT contact him in an emergency or have him in their record as an emergency contact. These statements were made pursuant to their desire to carry out the will of defendant Patricia Foley and to demean, disrespect and disparage the plaintiff as the father and equal parent responsible for the well being of his children. This animus is motivated by Patricia's and the defendants' disdain for the plaintiff and preference for divorced mothers, with whom they identify and prefer and would rather see have more rights and control while they act to deny the rights of fathers like the plaintiff. This hostile attitude is consistent with defendant Clark County School District's policy, custom, policy and practice to NOT follow State law (mandating that the best interests of children are served by having BOTH parents involved in children's lives), and the common, de facto practice to prefer the desires of mothers and disregard the concerns of fathers, and to dissuade and prevent fathers from being involved so that the sexual predator students and staff who are employed by the School District (and have not yet been arrested) may have an easier time and way with the children who attend the schools. For many years, the defendant school district has FAILED to inform the plaintiff of his children's progress by deliberately failing to include him to receive the notices that are mailed to the parents of Clark County School children, and by NEVER calling him when there is a problem or concern involving his children. Rather, the defendant school district has deliberately EXCLUDED the plaintiff from the usual phone communications that parents have, up until this lawsuit was filed. However, the defendant school district consistently and repeatedly disables his online access to the "Infinite Campus" online information service for parents, usually within a month of him having to go through much trouble and

**COUNT III (continued)**

The following civil rights has been violated: \_\_\_\_\_

The fundamental constitutional right to the companionship, care, custody and management of one's children and their education.

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

and aggravation to restore access to the online student information system. Due to this deliberate and repetitive disabling of his online access to his children's academic information, the plaintiff often remains in the dark and without information about his children's grades and attendance, and without knowledge of the children's schedules, their classes, and any other information that parents need to help their children succeed in their academic career. The defendant Patricia Foley wants it this way so that the Plaintiff cannot know when his children are taken out of school as she often removes them to prevent the plaintiff from taking custody of them pursuant to the latest custody orders issued by the Clark County Family Court. Not until the plaintiff survived a motion to dismiss in another action by the Clark County Family Court. Not until the plaintiff survived a motion to dismiss in another action and successfully demonstrated to Desert Oasis High School officials that he was serious about taking court action against the schools was the Plaintiff able to persuade high school D.O. and Middle School Canarelli to include the plaintiff as a recipient of the same automated calls concerning the children that defendant Patricia Foley receives, and to rescind their threat to arrest the plaintiff for entering the DO campus to attend to his son's education. However Defendants Monica Lang, Doreen Kwiecien, Debbie Hancock, and Christopher Hosein remain committed to preventing the plaintiff from taking custody of his daughter at Canarelli Middle School, and from entering the campus without getting arrested and prosecuted for "trespassing." These threats have the effect of chilling the plaintiff, as a fit parent, from exercising his fundamental constitutional right to attend to his children, manage their education, and do what is in their best interests as other parents do (who are NOT divorced, and NOT threatened with arrest). This policy of discriminating against divorced fathers (based on marital status) violates the Plaintiff's right to equal protection of the laws, and to due process when these illegal and unconstitutional policies and practices are enforced against him arbitrarily, capriciously, and with the defendants' intent to chill the plaintiff from exercising his rights and duty to protect and rear his children as he deems reasonable, necessary and fit. The Defendants actions and conduct toward the plaintiff have been unreasonable, unjustifiable and wrongful as they are intended to prevent him from having normal and reasonable interactions with the school so that his children can have at least one fit and capable parent involved in their academic careers. Patricia is NOT a fit or a capable parent because she is addicted to video poker and other gambling, and sleeps all day after she gambles all night, and leads a lifestyle that prevents her from responding to the schools and its officials while school is in session. Still, to this day, the plaintiff is excluded and disregarded as a fit parent entitled to equal protection of the laws by most of these defendants (and all of the Canarelli defendants).

**COUNT IV**

The following civil rights has been violated: \_\_\_\_\_

The right to due process as guaranteed by the 14th Amendment.

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

These adverse actions violate the Plaintiff's right to due process as guaranteed by the 14th Amendment to the constitution because they are arbitrary, capricious, open-ended and lack any recourse for the plaintiff. NONE of the defendants named herein have EVER offered the plaintiff a hearing or an opportunity to formally dispute the adverse actions that they have taken against him, but rather perpetuate harsh and unreasonable hostility with no way for the plaintiff to timely have these adverse conditions (that prevent him from attending to his children at their schools) removed by a superior and unbiased official. Until the plaintiff's 14th amendment right to have a hearing, or some means by which the adverse actions taken against him could be challenged and remediated, the plaintiff remains without recourse and without any way to have normal treatment and respect for his equal right to be a parent to his children, and not be treated as though he has no rights or any say with regard to his children's education and academic careers.

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**D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF**

- 1) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? \_\_\_\_ Yes X No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: N/A
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**  
 X  Yes \_\_\_\_ No. If your answer is “Yes”, describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: Jennifer Morrone, Steven Wolfson, Clark County and others
- b) Name of court and case number: 2:13-cv-01639-APG-NJK (Dist. of Nevada)
- c) The case was dismissed because it was found to be (check one): \_\_\_\_ frivolous  
 \_\_\_\_ malicious or  X  failed to state a claim upon which relief could be granted.
- d) Issues raised: 4th and 14th Amendment grievances for threats against plaintiff's liberty, due process and property rights. Four lawsuits have since been filed since the court's failure to recognize the threats and failure to grant relief.
- e) Approximate date it was filed: 9-9-2013
- f) Approximate date of disposition: 8-29-2014

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: N/A
- b) Name of court and case number: \_\_\_\_\_

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? \_\_\_\_ Yes X No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_\_ disciplinary hearing; (2) \_\_\_\_ state or federal court decision; (3) \_\_\_\_ state or federal law or regulation; (4) \_\_\_\_ parole board decision; or (5) X other The defendants don't allow for alternative relief.
- If your answer is "Yes", provide the following information. Grievance Number \_\_\_\_.
- Date and institution where grievance was filed \_\_\_\_\_.

Response to grievance: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

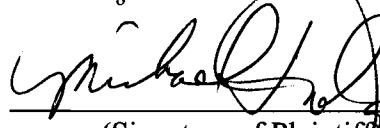
Injunctive relief in the form of an order barring the defendants from continuing in their  
offensive conduct. An order requiring the government defendants to be trained in the  
fundamental constitutional rights that parents have to the companionship, care,  
custody, and management of thier children who are enrolled as students at Clark  
County School District Schools.

An order awarding damages in amount no less than \$1 million.

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I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(Name of Person who prepared or helped  
prepare this complaint if not Plaintiff)

  
\_\_\_\_\_  
(Signature of Plaintiff)

4-4-2018  
(Date)

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(Additional space if needed; identify what is being continued)

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